CLAIM 7		
A lawn mower as set	Claim 7 is invalid under 35	
forth in claim 2 wherein	U.S.C. §103 in view of various	
at least two front rotary	prior art references, alone or in	
cutting deck assemblies	combination.	
are mounted on said		
frame in a side-by-side	All of the Category A art included	
	front decks in the configuration	
relationship defining a	claimed.	
gap between adjacent front deck assemblies.	Claimed.	
from deck assemblies.	Category G art discloses reel	Categories C, D and E art
		,
	mowers having the claimed	teach rotary cutting
CY AVIA	configuration.	decks.
CLAIM 8	01: 0::1:-1:1 1 25	
A lawn mower as set	Claim 8 is invalid under 35	
forth in claim 7 wherein	U.S.C. §103 in view of various	
at least one rear deck	prior art references, alone or in	
assembly is aligned with	combination.	
said gap.		
	All of the Category A art included	
	rear decks in the configuration	
	claimed.	
	Category G art discloses reel	Categories C, D and E art
	mowers having the claimed	teach rotary cutting
	mowers having the claimed configuration.	
	mowers having the claimed configuration.	teach rotary cutting
a frame supported by	mowers having the claimed configuration.	teach rotary cutting
	mowers having the claimed configuration. rotary lawn mower comprising Claim 10 is invalid under 35 U.S.C. §103 in view of various	teach rotary cutting
a frame supported by	mowers having the claimed configuration. rotary lawn mower comprising Claim 10 is invalid under 35 U.S.C. §103 in view of various prior art references, alone or in	teach rotary cutting
a frame supported by front and rear wheels for	mowers having the claimed configuration. rotary lawn mower comprising Claim 10 is invalid under 35 U.S.C. §103 in view of various	teach rotary cutting
a frame supported by front and rear wheels for movement over the	mowers having the claimed configuration. rotary lawn mower comprising Claim 10 is invalid under 35 U.S.C. §103 in view of various prior art references, alone or in	teach rotary cutting
a frame supported by front and rear wheels for movement over the	mowers having the claimed configuration. rotary lawn mower comprising Claim 10 is invalid under 35 U.S.C. §103 in view of various prior art references, alone or in	teach rotary cutting
a frame supported by front and rear wheels for movement over the	mowers having the claimed configuration. rotary lawn mower comprising Claim 10 is invalid under 35 U.S.C. §103 in view of various prior art references, alone or in combination.	teach rotary cutting
a frame supported by front and rear wheels for movement over the	mowers having the claimed configuration. rotary lawn mower comprising Claim 10 is invalid under 35 U.S.C. §103 in view of various prior art references, alone or in combination. The Lesco 500 Rotary and	teach rotary cutting
a frame supported by front and rear wheels for movement over the	mowers having the claimed configuration. rotary lawn mower comprising Claim 10 is invalid under 35 U.S.C. §103 in view of various prior art references, alone or in combination. The Lesco 500 Rotary and Risboro mowers each have such a	teach rotary cutting
a frame supported by front and rear wheels for movement over the	mowers having the claimed configuration. rotary lawn mower comprising Claim 10 is invalid under 35 U.S.C. §103 in view of various prior art references, alone or in combination. The Lesco 500 Rotary and Risboro mowers each have such a	teach rotary cutting
a frame supported by front and rear wheels for movement over the	mowers having the claimed configuration. rotary lawn mower comprising Claim 10 is invalid under 35 U.S.C. §103 in view of various prior art references, alone or in combination. The Lesco 500 Rotary and Risboro mowers each have such a frame.	teach rotary cutting
a frame supported by front and rear wheels for movement over the	mowers having the claimed configuration. rotary lawn mower comprising Claim 10 is invalid under 35 U.S.C. §103 in view of various prior art references, alone or in combination. The Lesco 500 Rotary and Risboro mowers each have such a frame. The Nunes mowers of Category A	teach rotary cutting
a frame supported by front and rear wheels for movement over the	mowers having the claimed configuration. rotary lawn mower comprising Claim 10 is invalid under 35 U.S.C. §103 in view of various prior art references, alone or in combination. The Lesco 500 Rotary and Risboro mowers each have such a frame. The Nunes mowers of Category A	teach rotary cutting
a frame supported by front and rear wheels for movement over the	mowers having the claimed configuration. rotary lawn mower comprising Claim 10 is invalid under 35 U.S.C. §103 in view of various prior art references, alone or in combination. The Lesco 500 Rotary and Risboro mowers each have such a frame. The Nunes mowers of Category A have such a frame.	teach rotary cutting
a frame supported by front and rear wheels for movement over the	mowers having the claimed configuration. rotary lawn mower comprising Claim 10 is invalid under 35 U.S.C. §103 in view of various prior art references, alone or in combination. The Lesco 500 Rotary and Risboro mowers each have such a frame. The Nunes mowers of Category A have such a frame. Category G art discloses reel	teach rotary cutting
a frame supported by front and rear wheels for movement over the	mowers having the claimed configuration. rotary lawn mower comprising Claim 10 is invalid under 35 U.S.C. §103 in view of various prior art references, alone or in combination. The Lesco 500 Rotary and Risboro mowers each have such a frame. The Nunes mowers of Category A have such a frame. Category G art discloses reel mowers having such a frame	teach rotary cutting
a frame supported by front and rear wheels for movement over the ground,	mowers having the claimed configuration. rotary lawn mower comprising Claim 10 is invalid under 35 U.S.C. §103 in view of various prior art references, alone or in combination. The Lesco 500 Rotary and Risboro mowers each have such a frame. The Nunes mowers of Category A have such a frame. Category G art discloses reel mowers having such a frame supported by wheels.	teach rotary cutting
a frame supported by front and rear wheels for movement over the ground, a power source which is	mowers having the claimed configuration. rotary lawn mower comprising Claim 10 is invalid under 35 U.S.C. §103 in view of various prior art references, alone or in combination. The Lesco 500 Rotary and Risboro mowers each have such a frame. The Nunes mowers of Category A have such a frame. Category G art discloses reel mowers having such a frame supported by wheels. The Lesco 500 Rotary and	teach rotary cutting
a frame supported by front and rear wheels for movement over the ground, a power source which is mounted on said frame	mowers having the claimed configuration. rotary lawn mower comprising Claim 10 is invalid under 35 U.S.C. §103 in view of various prior art references, alone or in combination. The Lesco 500 Rotary and Risboro mowers each have such a frame. The Nunes mowers of Category A have such a frame. Category G art discloses reel mowers having such a frame supported by wheels. The Lesco 500 Rotary and Risboro mowers each have an	teach rotary cutting

	The Nunes mowers of Category A have an engine that drives the wheels.	
	Category G art discloses reel mowers having an engine.	
an operator's seat	The Lesco 500 Rotary and	
mounted on said frame;	Risboro mowers each have a seat.	
	The Nunes mowers of Category A have a seat.	
	Category G art discloses reel mowers having a seat.	
a steering system	The Lesco 500 Rotary and	***************************************
enabling the operator to steer said lawn mower;	Risboro mowers each have a steering system.	
	The Nunes mowers of Category A have a steering system.	
	Category G art discloses reel mowers having steering systems.	
at least two front rotary cutting deck assemblies mounted to said frame in front of said front wheels and in a side-by- side relationship, wherein each of said	The Lesco 500 Rotary and Risboro mowers each have the claimed configuration of front cutting decks which cut a path.	It would have been obvious to combine the art of Category B and the other Category A mowers with the art of Category G.
front cutting deck assemblies defines a front cutting path; and	The Nunes mowers of Category A have the claimed configuration of front cutting decks that cut a path.	
	Category G art discloses reel mowers having the claimed configuration of front cutting decks that cut a path.	Categories B, C, and D teach rotary cutting decks.
at least one rear rotary cutting deck assembly being mounted on said frame behind said front deck assemblies, said rear rotary cutting deck assembly defining a rear	Both the Lesco 500 Rotary and Risboro mowers have a rear deck that has a path overlapping a portion of the front cutting paths.	It would have been obvious to combine the art of Category B and the other Category A mowers with the art of Category G.

		72
cutting path extending	The Nunes mowers of Category A	
laterally to overlap a	have the claimed configuration of	
portion of each of said	rear cutting decks that cut a path	1
front cutting paths,	that overlaps a portion of the front]
	deck's cutting paths.	
	Category G art discloses reel	Categories B, C, and D
	mowers having the claimed	teach rotary cutting
	configuration of rear cutting decks	decks.
	that cut a path, which would	:
	overlap a portion of the front	
	deck's cutting path.	
wherein each of said	Both the Lesco 500 Rotary and	
front and rear deck	Risboro mowers have full width	
assemblies has at least	rear rollers and cutting decks with	
one cutting blade	at least one blade and spindle.	
mounted on a spindle for		
rotation therewith and at	The Nunes mowers of Category A	Categories C and D teach
least one roller to	disclose rotary cutting decks.	full-width rear rollers
support each of said		supporting rotary decks.
deck assemblies for		
movement over the	Category G art discloses reel	Categories B, C, and D
ground, said roller	mowers having full-width rollers.	teach rotary mowers with
extending substantially		full-width rear rollers.
across the entire width		
of said cutting path.		
CLAIM 11		
A lawn mower as set	Claim 11 is invalid under 35	
forth in claim 10	U.S.C. §103 in view of various	
wherein each deck	prior art references, alone or in	
assembly is connected to	combination.	
said frame by a		
respective lifting arm	Categories A and G include	
operable to lift the	mowers that have deck assemblies	
associated deck	connected to the frame by	
assembly relative to said	individual lift arms.	
frame, such that each of		
•		
	1	
	prior art references, alone or in	
	combination.	
assemblies includes a		
said deck assemblies is connected by its own lifting arm to said frame. CLAIM 12 A lawn mower as set forth in claim 10 wherein each of said front and rear deck assemblies includes a		

pair of laterally-spaced, generally vertically- extending side plates having forward ends,	The Risboro reference included, as Textron has applied the terms, laterally spaced and vertically extending side plates.	In addition, the other Category A mowers combined with Categories D and F art disclose this side-plate feature.
a first front wheel supporting one of said side plates for movement over the ground, and a second front wheel supporting the other of said side plates for movement over the ground,	The Category A references, except Risboro, include front wheels.	Category A mowers combined with Category D and F art teach side plates.
wherein said roller extends between said side plates and supports said side plates for movement over the ground,	The Risboro reference included a full width rear roller as claimed.	It also would have been obvious to combine the other Category A references with the art of Category F or the Attack Engineering or similar references.
wherein the associated deck is located between said side plates and in front of said roller and is mounted on said side plates such that the height of said deck relative to the ground is adjustable by changing the position of said deck relative to said side plates.		It would have been obvious to combine the Category A art with the Category D and F art.

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

TEXTRON INNOVATION	IS INC.)	
TEXTROIT INTO VITTO	Plaintiff,))	C. A. No. 05-486 (GMS)
v.)	(Jury Trial Demanded)
THE TORO COMPANY,)	
	Defendant.	j	

EXHIBIT E: INVALIDITY OF ASSERTED CLAIMS OF THE '312 PATENT <u>UNDER 35 U.S.C. §102</u>

CLAIMS	PRIOR ART		
CLAIM 1: A gang-type rotary lawn mower comprising			
a frame supported by front wheels and at least one rear wheel for	Claim 1 is invalid under 35 U.S.C. § 102.		
movement over the ground;	The Lesco 500 Rotary mower and Risboro reference each have such a frame.		
	In addition, U.S. Patent No. 3,236,034 discloses the claimed frame.		
a power source which is mounted on said frame and which drives at least two of said wheels;	The Lesco 500 Rotary mower and Risboro reference each have an engine mounted on the frame.		
	In addition, U.S. Patent No. 3,236,034 discloses an engine mounted on the frame.		
an operator's seat mounted on said frame;	The Lesco 500 Rotary mower and Risboro reference each have a seat.		
	In addition, U.S. Patent No. 3,236,034 discloses a seat.		
a steering system enabling the operator to steer said lawn mower;	The Lesco 500 Rotary mower and Risboro reference each have a steering wheel.		
	In addition, U.S. Patent No. 3,236,034 discloses a steering system.		
at least two side-by-side front rotary cutting deck assemblies mounted on said frame in front of	The Lesco 500 Rotary mower and Risboro reference each have the claimed configuration of front cutting decks which define a gap.		

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CLAIM 5	
The lawn mower of claim 4	Claim 5 is invalid under 35 U.S.C. § 102.
wherein said rolling path includes	Claim 5 is invalid and 55 c.s.c. § 102.
a portion traveled by both of said	As this element has been applied by Textron to
first and second rollers.	Toro's accused products, the Lesco 500 Rotary
mst and second roners.	mower has a rolling path traveled by two rollers.
CLAIM 8	mower has a forming pain traveled by two foriers.
The lawn mower of claim 1	Claim 8 is invalid under 35 U.S.C. § 102.
wherein said first roller of said at	Claim o is invalid under 33 C.S.C. § 102.
least one front deck assembly	As this element has been applied by Textron to
defines a rolling path and said	Toro's accused products, both the Lesco 500 Rotary
first roller of said corresponding	mower and the Risboro brochure have the claimed
at least one rear deck assembly	rolling path features.
	Toming pain reatures.
defines a rolling path.	
CLAIM 9 The lawn mower of claim 8	Claim 9 is invalid under 35 U.S.C. § 102.
	Claim 9 is invalid under 33 O.S.C. § 102.
wherein said rolling path defined	As this element has been applied by Textron to
by said front deck assembly roller	Toro's accused products, both the Lesco 500 Rotary
overlaps said rolling path defined	mower and the Risboro reference have a front roller
by said rear deck assembly roller.	
CI ATAK 10	path that overlaps the rear roller path overlap.
CLAIM 10	GL: 10: :1:1 1 25 H G G \$ 103
The lawn mower of claim 8	Claim 10 is invalid under 35 U.S.C. § 102.
wherein said rolling path defined	And the American
by said front deck assembly roller	As this element has been applied by Textron to
includes an inboard edge aligned	Toro's accused products, both the Lesco 500 Rotary
with an outboard edge of said	mower and the Risboro reference have the claimed
rolling path defined by said rear	alignment.
deck assembly roller.	
CLAIM 11	GI. III I ASTUGA A LOS
The lawn mower of claim 8	Claim 11 is invalid under 35 U.S.C. § 102.
wherein said rolling path defined	
by said front deck assembly roller	As this element has been applied by Textron to
is spaced apart from said rolling	Toro's accused products, both the Lesco 500 Rotary
path defined by said rear deck	mower and the Risboro reference have the claimed
assembly roller.	spacing.
CLAIM 12	
The lawn mower of claim 1	
wherein each of said front and	
rear deck assemblies further	
includes a pair of rotatable wheels	
pivotally mounted to said frame.	
CLAIM 14	
The lawn mower of claim 1	Claim 14 is invalid under 35 U.S.C. § 102.
further including a lifting arm	
pivotally interconnecting each of	As this element has been applied by Textron to

said front deck assemblies to said	Toro's accused products, both the Lesco 500 Rotary
frame, said lifting arm pivoting	mower and the Risboro reference have lifting arms
about an axis laterally extending	as claimed.
across said deck assembly	
substantially parallel to the	
ground and perpendicular to the	
direction of travel.	
CLAIM 15	
The lawn mower of claim 1	Claim 15 is invalid under 35 U.S.C. § 102.
wherein said first roller is a	
unitary, one-piece roller.	As this element has been applied by Textron to
	Toro's accused products, both the Lesco 500 Rotary
	mower and the Risboro reference include unitary,
	one piece rollers.
CLAIM 16	
The lawn mower of claim 1	
wherein said first roller is a	
segmented roller having a	
plurality of roller segments.	
CLAIM 17	
The lawn mower of claim 16	
wherein said roller segments are	
aligned along an axis of rotation.	
CLAIM 19: A cutting deck assem	bly for a gang-type rotary lawn mower having a
	comprising:
a deck defining a downwardly	4
opening space;	
at least one and in 11 1	
at reast one cutting blade mounted	
at least one cutting blade mounted on a spindle for rotation	
on a spindle for rotation therewith;	
on a spindle for rotation therewith;	
on a spindle for rotation therewith; a pair of laterally-spaced.	
on a spindle for rotation therewith; a pair of laterally-spaced, generally vertically extending	
on a spindle for rotation therewith; a pair of laterally-spaced, generally vertically extending side plates having forward ends;	
on a spindle for rotation therewith; a pair of laterally-spaced, generally vertically extending side plates having forward ends; a first front wheel supporting one	
on a spindle for rotation therewith; a pair of laterally-spaced, generally vertically extending side plates having forward ends; a first front wheel supporting one of said side plates for movement	
on a spindle for rotation therewith; a pair of laterally-spaced, generally vertically extending side plates having forward ends; a first front wheel supporting one of said side plates for movement over the ground;	
on a spindle for rotation therewith; a pair of laterally-spaced, generally vertically extending side plates having forward ends; a first front wheel supporting one of said side plates for movement over the ground; a second front wheel supporting	
on a spindle for rotation therewith; a pair of laterally-spaced, generally vertically extending side plates having forward ends; a first front wheel supporting one of said side plates for movement over the ground; a second front wheel supporting the other of said side plates for	
on a spindle for rotation therewith; a pair of laterally-spaced, generally vertically extending side plates having forward ends; a first front wheel supporting one of said side plates for movement over the ground; a second front wheel supporting the other of said side plates for movement over the ground;	
on a spindle for rotation therewith; a pair of laterally-spaced, generally vertically extending side plates having forward ends; a first front wheel supporting one of said side plates for movement over the ground; a second front wheel supporting the other of said side plates for movement over the ground; a roller extending between said	
on a spindle for rotation therewith; a pair of laterally-spaced, generally vertically extending side plates having forward ends; a first front wheel supporting one of said side plates for movement over the ground; a second front wheel supporting the other of said side plates for movement over the ground; a roller extending between said side plates supporting said side	
on a spindle for rotation therewith; a pair of laterally-spaced, generally vertically extending side plates having forward ends; a first front wheel supporting one of said side plates for movement over the ground; a second front wheel supporting the other of said side plates for movement over the ground; a roller extending between said side plates supporting said side plates for movement over the	
on a spindle for rotation therewith; a pair of laterally-spaced, generally vertically extending side plates having forward ends; a first front wheel supporting one of said side plates for movement over the ground; a second front wheel supporting the other of said side plates for movement over the ground; a roller extending between said side plates supporting said side plates for movement over the ground, wherein said deck is	
on a spindle for rotation therewith; a pair of laterally-spaced, generally vertically extending side plates having forward ends; a first front wheel supporting one of said side plates for movement over the ground; a second front wheel supporting the other of said side plates for movement over the ground; a roller extending between said side plates supporting said side plates for movement over the ground, wherein said deck is coupled to said side plates and	
on a spindle for rotation therewith; a pair of laterally-spaced, generally vertically extending side plates having forward ends; a first front wheel supporting one of said side plates for movement over the ground; a second front wheel supporting the other of said side plates for movement over the ground; a roller extending between said side plates supporting said side plates for movement over the ground, wherein said deck is	

partially across the width of said deck.	
CLAIM 25	
The lawn mower of claim 24 wherein said first roller and said	Claim 25 is invalid under 35 U.S.C. § 102.
second roller are positioned in	The Lesco 500 Rotary mower includes a first and
along different axes of rotation.	second roller in the claimed configuration, as
	Textron has interpreted it.
CLAIM 26	
The lawn mower of claim 25 wherein said third roller and said	Claim 26 is invalid under 35 U.S.C. § 102.
second roller rotate about the	The Lesco 500 Rotary mower includes a second and
same axis of rotation.	third roller in the claimed configuration, as Textron
	has interpreted it.
CLAIM 27	
The lawn mower of claim 26	Claim 27 is invalid under 35 U.S.C. § 102.
wherein said second and third	
rollers are positioned forward of	The Lesco 500 Rotary mower includes a first,
said first roller.	second and third roller in the claimed configuration,
	as Textron has interpreted it.

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IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

)	
TEXTRON INNOVATIONS INC.,)	
)	C. A. No. 05-486 (GMS)
	Plaintiff,)	
v.)	(Jury Trial Demanded)
)	
THE TORO COMPANY,)	
)	
	Defendant.)	

EXHIBIT F: INVALIDITY OF ASSERTED CLAIMS OF THE '312 PATENT UNDER 35 U.S.C. §103

CLAIMS	PRIOR ART	
CLAIM 1: A gang-ty	pe rotary lawn mower comprising	
a frame supported by	Claim 1 is invalid under 35 U.S.C.	
front wheels and at	§103 in view of various prior art	
least one rear wheel	references, alone or in combination.	
for movement over		
the ground;	The Category A art each have such a	
	frame.	
	The Category G art each have such a	
	frame.	
	U.S. Patent No. 3,236,034 discloses	
	the claimed frame.	
	Category B art discloses a frame.	
a power source	The Category A art each have an	
which is mounted on	engine mounted on the frame.	
said frame and		
which drives at least	The Category G art each have an	
two of said wheels;	engine mounted on the frame.	
	U.S. Patent No. 3,236,034 discloses an	
	engine mounted on the frame.	·
	-	
	Category B art discloses an engine.	
an operator's seat	The Category A art each have a seat.	
mounted on said		

frame;	The Category G art each have a seat.	
	U.S. Patent No. 3,236,034 discloses a seat.	
	Category B art discloses a seat.	
a steering system	The Category A art each have a	
enabling the operator to steer said lawn	steering system.	
mower;	The Category G art each have a steering system.	
	U.S. Patent No. 3,236,034 discloses a steering system.	
	Category B art discloses a steering system.	
at least two side-by-	The Category A art each have the	
side front rotary cutting deck	claimed configuration of front cutting decks as interpreted by Textron.	
assemblies mounted	decks as interpreted by Texton.	
on said frame in front of said front	The Category G art discloses the required configuration of front cutting	The Categories C, D and I art teach rotary
wheels, said front deck assemblies	decks as interpreted by Textron.	decks.
defining a gap between adjacent	U.S. Patent No. 3,236,034 discloses	
front deck	the claimed configuration of front	
assemblies; and	cutting decks as interpreted by Textron.	
	It would have been obvious to reposition the decks of the Category B	
	art in the claimed configuration of	
	front cutting decks as interpreted by	
	Textron.	
at least one rear	The Category A art each have the	
rotary cutting deck	claimed configuration of rear cutting	
assembly mounted on said frame behind	decks as interpreted by Textron to accuse Toro's products of	
said front deck	infringement.	
assemblies and	, and the second	
between said front	The Category G art each disclose the	Categories C, D and I
wheels, each rear deck assembly being	claimed rear deck configuration.	art teach rotary cutting decks.

aligned with a respective gap between adjacent front deck assemblies;	U.S. Patent No. 3,236,034 discloses the claimed configuration of the at least one rear rotary cutting deck as interpreted by Textron. It would have been obvious to reposition the decks of the Category B art in the claimed rear deck arrangement.	
each of said front and rear deck assemblies including a deck defining a downwardly opening space, at least one cutting blade mounted on a spindle for rotation therewith and a first roller supporting said deck for movement over the ground, said first roller extending only partially across the width of said deck.	The Risboro Turf brochure discloses decks which define a downwardly opening space, as Textron uses that term to accuse Toro's products. The Risboro brochure discloses mower decks having at least one cutting blade mounted on a spindle and a roller extending only partially across the width of the deck. As Textron construes this limitation to accuse Toro's products of infringement, the Lesco 500 Rotary, the Deere 3235A with Nunes, and the Deere with Nunes 355 discloses decks which define a downwardly opening space, at least one cutting blade mounted on a spindle, and a roller extending only partially across the width of the deck.	In addition, Category I art teaches rollers that extend only partially across the width of rotary decks.
	The Category G art teaches reel mowers with a roller.	The Category I art teaches rotary decks having a roller that extends only partially across the width of the decks.
	In addition, using the construction Textron uses to accuse Toro's products of infringement, U.S. Patent No. 3,236,034 discloses decks having a downwardly opening space, at least one cutting blade mounted on a	

having two rollers in

offset positions to each other.

spindle, and a roller extending only partially across the width of the deck. For example, rollers 15. Category B art discloses decks having a downwardly opening space, at least one cutting blade mounted on a spindle, and a roller extending only partially across the width of the deck. **CLAIM 2** Claim 2 is invalid under 35 U.S.C. The lawn mower of claim 1 wherein each §103 in view of various prior art of said front and rear references, alone or in combination. deck assemblies As this limitation has been construed further includes a by Textron to accuse Toro's products second roller of infringement, the Risboro brochure positioned in offset teaches front and rear deck assemblies relation to said first having a second roller offset from the roller. first roller. As this limitation has been construed by Textron to accuse Toro's products of infringement, the Lesco 500 Rotary mower, the Deere 3235A with Nunes, and the Deere with Nunes 355, disclose a second roller in offset relation to the first roller. As Textron construes this limitation to accuse Toro's products of infringement, Category B art discloses rotary decks with two rollers in offset positions to each other. Category D and I art As this limitation is construed by disclose rotary decks Textron to accuse Toro's products of

infringement, Category G art discloses decks in the claimed configuration.

Using the construction Textron uses to

accuse Toro's products of infringement, U.S. Patent No.

		1
	3,236,034 discloses a second roller in	
	offset relation to the first.	
CLAIM 3	Table 2000	y
The lawn mower of	Claim 3 is invalid under 35 U.S.C.	
claim 2 wherein each	§103 in view of various prior art	
of said front and rear	references, alone or in combination.	
deck assemblies		
further includes a	As this limitation has been construed	Category D and I art
third roller having an	by Textron to accuse Toro's products	teach using three
axis of rotation	of infringement, the Risboro brochure	rollers where two of
aligned with an axis	teaches front and rear deck assemblies	the rollers are aligned
of rotation of said	having two rollers.	in the axis of rotation
second roller.		and a third roller is
		positioned offset
		from the first two.
	As this limitation has been construed	
	by Textron to accuse Toro's products	
	of infringement, the Lesco 500 Rotary	
	mower, the Deere 3235A with Nunes,	
	and the Deere with Nunes 355,	
	disclose a third roller aligned with the	
	axis of rotation of the second roller.	
	As Textron construes this limitation to	
	accuse Toro's products of	
	infringement, Category B art discloses	
	rotary decks with a third roller aligned	
	with the axis of rotation of the second	
	roller.	
	A = at the think that the second of the	G
	As this limitation is construed by	Category D and I art
	Textron to accuse Toro's products of	disclose rotary decks
	infringement, Category G art discloses	having a third roller
	decks in the claimed configuration.	aligned with the axis
		of rotation of the
		second roller.
	Haina the construction Toutes a	
	Using the construction Textron uses to	
	accuse Toro's products of	
	infringement, U.S. Patent No.	
	3,236,034 discloses a third roller	
	aligned with the axis of rotation of the	**************************************

, posteriorista de la composición de la composic	second roller.	
CLAIM 4		
The lawn mower of	Claim 4 is invalid under 35 U.S.C.	
claim 3 wherein each	§103 in view of various prior art	
of said first, second	references, alone or in combination.	
and third rollers define a rolling path	As Textron has construed this claim to	
substantially	accuse Toro's products of	
uninterrupted across	infringement, the Lesco 500 Rotary	
the width of the	mower had two front rollers and one	
deck.	rear roller which defined a rolling path	
	substantially uninterrupted across the	
	deck.	
	As Textron has construed this claim to accuse Toro's products of infringement, the Risboro brochure teaches a front roller and a rear roller that define a rolling path substantially uninterrupted across the width of the deck.	Category D and I art disclose the use of three rollers that define a rolling path substantially uninterrupted across the width of the deck.
	The Deere 3235A with Nunes, and the Deere with Nunes 355, disclose multiple rollers.	Category D and I art teach the use of three rollers to define a rolling path substantially uninterrupted across the width of the deck.
	As Textron has construed this claim to accuse Toro's products of infringement, Category G art discloses cutters in the claimed configuration.	Category D and I art teach the use of rotary decks having three rollers to define a rolling path substantially uninterrupted across the width of the deck.
CLAIM 5		are within of the tieck.
The lawn mower of	Claim 5 is invalid under 35 U.S.C.	3 7 M Males 1
claim 4 wherein said	§103 in view of various prior art	
rolling path includes	references, alone or in combination.	
a portion traveled by		
both of said first and	As Textron has construed this claim to	
second rollers.	accuse Toro's products of	***************************************

infringement, the Lesco 500 Rotary mower had a rolling path that was traveled by both the first and second rollers.

As Textron has construed this claim to accuse Toro's products of infringement, the Risboro brochure teaches a first and second roller that defines a rolling path where both the first and second roller travel at least a portion of the rolling path.

Category D and I art disclose the use of three rollers that travel a portion of the same rolling path.

The Deere 3235A with Nunes, and the Deere with Nunes 355, disclose multiple rollers.

Category D and I art disclose the use of three rollers that travel a portion of the same rolling path.

As Textron has construed this claim to accuse Toro's products of infringement, Category G art discloses cutters in the claimed configuration.

Category D and I art disclose the use of rotary cutters that have three rollers that travel a portion of the same rolling path.

CLAIM 8

The lawn mower of claim 1 wherein said first roller of said at least one front deck assembly defines a rolling path and said first roller of said corresponding at least one rear deck assembly defines a rolling path.

Claim 8 is invalid under 35 U.S.C. §103 in view of various prior art references, alone or in combination.

The Lesco 500 Rotary mower and the Risboro brochure teach front and rear decks having rollers that define a rolling path.

In addition, as this claim has been construed to accuse Toro's products of infringement, the other Category A art includes a front deck having a first roller that defines a rolling path and a rear deck having a first roller defines a cutting path.

In addition, as Textron construes this claim to accuse Toro's products of infringement, U.S. Patent No.

3,236,034 discloses front and rear deck roller that define a rolling path. In addition, as Textron construes this claim to accuse Toro's products of infringement, Category B art discloses front and rear decks having rollers that define a rolling path. As Textron has construed this claim to Category D and I art disclose rotary decks accuse Toro's products of having rollers that infringement, Category G art discloses define a rolling path. cutters having a roller that defines a rolling path. CLAIM 9 Claim 9 is invalid under 35 U.S.C. The lawn mower of §103 in view of various prior art claim 8 wherein said references, alone or in combination. rolling path defined by said front deck As this limitation is construed by assembly roller Textron to accuse Toro's products of overlaps said rolling path defined by said infringement, the Lesco 500 Rotary mower and the Risboro brochure teach rear deck assembly front and rear decks having rollers that roller. define rolling paths that overlap. As this claim has been construed to accuse Toro's products of infringement, the other Category A art teach front and rear decks having rollers that define rolling paths that overlap. In addition, as Textron construes this claim to accuse Toro's products of infringement, Category B art teaches front and rear decks having rollers that define rolling paths that overlap. As Textron has construed this claim to U.S. Patent No. 3,654,749 or U.S. accuse Toro's products of infringement, Category G art discloses Patent No. 3,754,385

	cutters in the claimed configuration.	discloses rotary decks where the front deck rolling path overlaps the rear deck rolling path.
CLAIM 10		
The lawn mower of claim 8 wherein said rolling path defined by said front deck assembly roller includes an inboard edge aligned with an outboard edge of said rolling path defined by said rear deck assembly roller.	Claim 10 is invalid under 35 U.S.C. §103 in view of various prior art references, alone or in combination. As this limitation is construed by Textron to accuse Toro's products of infringement, Category A art teaches a front deck having a rolling path with an inboard edge that is aligned with the outboard edge of a rolling path of a rear deck roller.	
	As Textron has construed this claim to accuse Toro's products of infringement, Category G art discloses cutters in the claimed configuration.	Category C and D art teaches decks with rollers such that when placed in the configuration of Category G art the decks have a rolling path with an inboard edge that is aligned with the outboard edge of a rolling path of a rear deck roller.
CLAIM 11		
The lawn mower of claim 8 wherein said rolling path defined by said front deck assembly roller is spaced apart from	Claim 11 is invalid under 35 U.S.C. §103 in view of various prior art references, alone or in combination. As this limitation is construed by Textron to accuse Toro's products of infringement, Category A art teaches a	Category I art discloses rotary decks having rollers that
said rolling path defined by said rear deck assembly roller.	front deck having a rolling path with an inboard edge that is spaced apart from the outboard edge of a rolling path of a rear deck roller. As Textron has construed this claim to	define spaced rolling paths. Category D and I art
	accuse Toro's products of infringement, Category G art discloses	teach decks with spaced rollers such

		41 4 1 1 1 1
	cutters in the claimed configuration.	that when placed in the configuration of Category G art the decks have a rolling path with an inboard edge that is spaced apart from the outboard edge of a rolling path of a rear deck roller.
CLAIM 12		
The lawn mower of claim 1 wherein each of said front and rear deck assemblies further includes a pair of rotatable wheels pivotally mounted to said frame.	Claim 12 is invalid under 35 U.S.C. §103 in view of various prior art references, alone or in combination. As this limitation has been construed by Textron to accuse Toro's products of infringement, and to the extent this limitation is understood, the Lesco 500 Rotary mower and the Risboro brochure discloses decks with rotatable wheels pivotally mounted to the frame.	In addition, as this limitation has been construed by Textron to accuse Toro's products of infringement, and to the extent this limitation is understood, the other Category A references in combination with U.S. Patent No. 3,654,749 or U.S. Patent No. 3,754,385 teach this limitation.
CLAIM 14		W. W
The lawn mower of claim 1 further including a lifting arm pivotally interconnecting each of said front deck assemblies to said frame, said lifting arm pivoting about an axis laterally extending across said deck assembly substantially parallel to the ground and	Claim 14 is invalid under 35 U.S.C. §103 in view of various prior art references, alone or in combination. As this limitation is construed by Textron to accuse Toro's products of infringement, the Risboro brochure discloses and Lesco 500 mowers had lifting arms in the claimed configuration. In addition, the other Category A references disclose a lifting arm in the claimed configuration.	

perpendicular to the		
direction of travel.	The Category G references also	
direction of traver.	disclose a lift arm in the claimed	
	configuration.	
CLAIM 15		
The lawn mower of	Claim 15 is invalid under 35 U.S.C.	
claim 1 wherein said	§103 in view of various prior art	
first roller is a	references, alone or in combination.	
	references, anome or mr comments	
unitary, one-piece roller.	As this limitation is construed by	
TOHEL.	Textron to accuse Toro's products of	
	infringement, the Lesco 500 rotary	
	mowers have and the Risboro	
	brochure disclose a unitary, one-piece	
	roller.	
	Tonoi.	
	As this limitation is construed by	Categories C and D
	Textron to accuse Toro's products of	art disclose one-piece
	infringement, the other Category A art	rollers.
	disclose rotary cutting decks with one-	
	piece rollers.	
	prece forers.	
	As this limitation is construed by	Categories C and D
	Textron to accuse Toro's products of	art disclose one-piece
	infringement, the Category G art	rollers.
	discloses one-piece roller.	10110201
	discloses one-piece foner.	
CLAIM 16	Claim 16 is invalid under 35 U.S.C.	
The lawn mower of	§103 in view of various prior art	
claim 1 wherein said		
first roller is a	references, alone or in combination.	
segmented roller	A state time is an in intermented by	U.S. Patent No.
having a plurality of	As this limitation is interpreted by	3,654,749 or U.S.
roller segments.	Textron to accuse Toro's products of	Patent No. 3,754,385
	infringement, the Category A art	disclose rotary
	discloses rotary cutting decks.	I -
		cutting decks with
		segmented rollers.
	m d	
	To the extent that Category G art does	
	not disclose a segmented roller, as this	
	limitation is construed by Textron to	
	accuse Toro's products of	
	infringement, it would have been	
	obvious to combine them with U.S.	
	Patent No. 3,654,749 or U.S. Patent	
	No. 3,754,385 which disclose rotary	

	cutting decks with segmented rollers.	
CLAIM 17		
The lawn mower of	Claim 17 is invalid under 35 U.S.C.	
claim 16 wherein	§103 in view of various prior art	
said roller segments	references, alone or in combination.	
are aligned along an		
axis of rotation.	As this limitation is interpreted by	U.S. Patent No.
	Textron to accuse Toro's products of	3,654,749 or U.S.
	infringement, the Category A art	Patent No. 3,754,385
	discloses rotary cutting decks.	disclose rotary
		cutting decks with
		segmented rollers.
	To the extent that Category G art does	
	not disclose a segmented roller, as this	
	limitation is construed by Textron to	
	accuse Toro's products of	
	infringement, it would have been	
	obvious to combine them with U.S.	
	Patent No. 3,654,749 or U.S. Patent	
	No. 3,754,385 which disclose rotary	
	cutting decks with segmented rollers.	
	g deck assembly for a gang-type rotary	lawn mower having a
frame, the cutting de	ck assembly comprising:	
a deck defining a	Claim 19 is invalid under 35 U.S.C.	
downwardly opening	§103 in view of various prior art	
space;	references, alone or in combination.	
	The Category A art discloses a deck	
	The Category A art discloses a deck defining a downwardly opening space.	-
	defining a downwardry opening space.	
	Category C art discloses a deck	
	defining a downwardly opening space.	
	Category D art discloses a deck	
	defining a downwardly opening space.	
	Category F art discloses a deck	
	defining a downwardly opening space.	
at least one cutting	The Category A art discloses at least	
blade mounted on a	one cutting blade mounted on a	
spindle for rotation	spindle.	
therewith;	G	
	Category C art discloses at least one	
	cutting blade mounted on a spindle.	

	Category D art discloses at least one cutting blade mounted on a spindle.	
	Category F art discloses at least one cutting blade mounted on a spindle.	
a pair of laterally- spaced, generally vertically extending side plates having	The Category A art discloses rotary cutting decks.	Categories C, D, and F art disclose a pair of side plates.
forward ends;	Category C art discloses a pair of side plates.	
	Category D art discloses a pair of side plates.	
	Category F art discloses a pair of side plates.	
a first front wheel supporting one of said side plates for movement over the	The Category A art discloses rotary cutting decks.	Categories C, D, and F art disclose a pair of side plates.
ground;	Category C and D art disclose a deck having side plates supported by a front roller.	Category F art discloses a first wheel supporting one of the side plates.
	Category F art discloses a first front wheel supporting one of the side plates. See for example, U.S. Patent Nos. 1,954,579 and 3,537,720.	
a second front wheel supporting the other of said side plates for movement over	The Category A art discloses rotary cutting decks.	Categories C, D, and F art each disclose a pair of side plates.
the ground;	Category C and D art disclose a deck having side plates supported by a front roller.	Category F art discloses a first wheel supporting one of the side plates.
	Category F art discloses a first front wheel supporting one of the side plates. See for example, U.S. Patent Nos. 1,954,579 and 3,537,720.	
a roller extending between said side plates supporting	The Category A art discloses rotary cutting decks.	Categories C (see Major Groundsman 6000), D (see

said side plates for movement over the ground, wherein said deck is coupled to said side plates and located in front of said roller such that the height of said deck relative to the ground is adjustable by changing the position of said deck relative to said side plates; and Australian patent No. 11,914/70), and F (see U.S. Patent Nos. 1,954,579 and 3,537,720) art disclose a pair of side plates with a roller extending between the side plates and were the deck is attached to the side plates such that the height of cut is adjusted by moving the deck relative to the side plates. Category C art discloses a rear roller extending between side plates and
ground, wherein said deck is coupled to said side plates and located in front of said roller such that the height of said deck relative to the ground is adjustable by changing the position of said deck relative to said side plates; and (see U.S. Patent Nos. 1,954,579 and 3,537,720) art disclose a pair of side plates with a roller extending between the side plates and were the deck is attached to the side plates such that the height of cut is adjusted by moving the deck relative to the side plates. Category C art discloses a rear roller extending between side plates and
deck is coupled to said side plates and located in front of said roller such that the height of said deck relative to the ground is adjustable by changing the position of said deck relative to said side plates; and 1,954,579 and 3,537,720) art disclose a pair of side plates with a roller extending between the side plates and were the deck is attached to the side plates such that the height of cut is adjusted by moving the deck relative to the side plates. Category C art discloses a rear roller extending between side plates and
said side plates and located in front of said roller such that the height of said deck relative to the ground is adjustable by changing the position of said deck relative to said side plates; and 3,537,720) art disclose a pair of side plates with a roller extending between the side plates and were the deck is attached to the side plates such that the height of cut is adjusted by moving the deck relative to the side plates. Category C art discloses a rear roller extending between side plates and
located in front of said roller such that the height of said deck relative to the ground is adjustable by changing the position of said deck relative to said side plates; and Category C art discloses a rear roller extending between the side plates and were the deck is attached to the side plates such that the height of cut is adjusted by moving the deck relative to the side plates. Category C art discloses a rear roller extending between side plates and
said roller such that the height of said deck relative to the ground is adjustable by changing the position of said deck relative to said side plates; and Category C art discloses a rear roller extending between the side plates and were the deck is attached to the side plates such that the height of cut is adjusted by moving the deck relative to the side plates. Category C art discloses a rear roller extending between side plates and
the height of said deck relative to the ground is adjustable by changing the position of said deck relative to said side plates; and Category C art discloses a rear roller extending between the side plates and were the deck is attached to the side plates such that the height of cut is adjusted by moving the deck relative to the side plates.
deck relative to the ground is adjustable by changing the position of said deck relative to said side plates; and Category C art discloses a rear roller extending between side plates and the side plates and were the deck is attached to the side plates such that the height of cut is adjusted by moving the deck relative to the side plates.
ground is adjustable by changing the position of said deck relative to said side plates; and Category C art discloses a rear roller extending between side plates and were the deck is attached to the side plates such that the height of cut is adjusted by moving the deck relative to the side plates.
by changing the position of said deck relative to said side plates; and Category C art discloses a rear roller extending between side plates and attached to the side plates such that the height of cut is adjusted by moving the deck relative to the side plates.
position of said deck relative to said side plates; and Plates; and Category C art discloses a rear roller extending between side plates and
relative to said side plates; and Category C art discloses a rear roller extending between side plates and height of cut is adjusted by moving the deck relative to the side plates.
plates; and Category C art discloses a rear roller extending between side plates and
Category C art discloses a rear roller extending between side plates and
Category C art discloses a rear roller extending between side plates and
extending between side plates and
extending between side plates and
extending between side plates and
were the deck is attached to the side
plates such that the height of cut is
adjusted by moving the deck relative
to the side plates.
Avatralian
Kilworth, Port Agric, Australian Patents Nos. 11914/70 and 50523/64,
South African Patent Application Nos.
924978 and 942089, Teagle Topper 6,
Attack 150 Rollermower, and
Dowdswell Rollermowers of Category
Dowdswen Roberthowers of Category D disclose a roller extending between
the side plates and were the deck is
attached to the side plates such that the
height of cut is adjusted by moving the
deck relative to the side plates.
GOOK TOTALLY TO MES SING PROPERTY.
Category F art discloses a pair of side
plates having a roller extending there
between, and were the deck is attached
to the side plates such that the height
of cut is adjusted by moving the deck
relative to the side plates. See U.S.
Patent Nos. 1,954,579 and 3,537,720.
a lifting arm adapted The Category A art include lifting
to pivotally arms.
interconnect said

cutting deck assembly and the frame.	Category C and D art disclose a deck having side plates supported by a roller.	Category A or G art teach the claimed lifting arm.
	Category F art disclose a deck having side plates supported by a roller.	Category A or G art teach the claimed lifting arm.
CLAIM 20		1
The lawn mower of claim 19 wherein said roller is a unitary, one-piece roller.	Claim 20 is invalid under 35 U.S.C. §103 in view of various prior art references, alone or in combination. Lesco 500 Rotary and Risboro reference, of Category A, both include a unitary, one-piece rear roller.	The remaining Category A references, combined with Category D unitary rollers.
	Category C and D art disclose unitary rollers.	
	Category F art discloses unitary rollers.	
CLAIM 24: A gang-	ype rotary lawn mower comprising:	1
a frame supported by front wheels and at least one rear wheel for movement over the ground;	Claim 24 is invalid under 35 U.S.C. §103 in view of various prior art references, alone or in combination. The Category A art each have such a frame.	
	The Category G art each have such a frame. In addition U.S. Patent No. 3,236,034 discloses the claimed frame.	
	Category B art discloses a frame.	
a power source which is mounted on said frame and	The Category A art each have an engine mounted on the frame.	
which drives at least two of said wheels;	The Category G art each have an engine mounted on the frame.	
	In addition U.S. Patent No. 3,236,034	

	discloses an engine mounted on the	
	frame.	
	Category B art discloses an engine.	
an operator's seat	The Category A art each have a seat.	
mounted on said		
frame;	The Category G art each have a seat.	
	In addition U.S. Patent No. 3,236,034	
	discloses a seat.	
	Category B art discloses a seat.	
a steering system	The Category A art each have a	
enabling the operator	steering system.	
to steer said lawn		
mower;	The Category G art each have a	
	steering system.	
	In addition U.S. Patent No. 3,236,034	
	discloses a steering system.	
	Category B art discloses a steering	
	system.	
at least two side-by-	The Category A art each have the	
side front rotary	claimed configuration of front cutting	
cutting deck	decks.	
assemblies mounted		m a a D
on said frame in	The Category G art discloses the	The Categories C, D
front of said front	required configuration.	and I art teach rotary
wheels, said front		decks.
deck assemblies		
defining a gap	In addition U.S. Patent No. 3,236,034	
between adjacent	discloses the claimed configuration of	
front deck	front cutting decks.	
assemblies; and		
	It would have been obvious to	
	reposition the decks of the Category B	
	art in the claimed front deck	
	arrangement.	
at least one rear	The Category A art each have the	
rotary cutting deck	claimed configuration of rear cutting	
assembly mounted	decks.	
on said frame behind		
said front deck	The Category G art each disclose the	Categories C, D and I
assemblies, each rear	claimed rear deck configuration	art teach rotary
deck assembly being		cutting decks.

		····
aligned with a respective gap between adjacent front deck assemblies; each of said front and rear deck assemblies including a deck defining a downwardly opening space, at least one cutting blade mounted on a spindle for rotation therewith and a first, second and third roller supporting said deck for movement over the ground, said first roller extending only partially across the width of said deck.	In addition U.S. Patent No. 3,236,034 discloses the claimed configuration of the at least one rear rotary cutting deck. It would have been obvious to reposition the decks of the Category B art in the claimed rear deck arrangement. The Risboro Turf brochure discloses decks which define a downwardly opening space, as Textron uses that term to accuse Toro's products. The Risboro brochure discloses mower decks having at least one cutting blade mounted on a spindle. The Risboro brochure teaches front and rear deck assemblies having two rollers where one roller extends only partially across the width of the deck. As Textron construes this limitation to accuse Toro's products of infringement, the Lesco 500 Rotary, the Deere 3235A with Nunes, and the Deere with Nunes 355 discloses decks which define a downwardly opening space, at least one cutting blade mounted on a spindle, and a roller extending only partially across with width of the deck. The Lesco 500 Rotary mower, the Deere 3235A with Nunes, and the Deere with Nunes 355, disclose a second and third roller.	Category D and I art teaches using three rollers where two of the rollers are aligned in the access of rotation and a third roller is positioned offset from the first two.
	The Category G art teaches reel mowers with a roller.	The Category I art teaches rotary decks having three rollers with one roller extending only partially across the width of the deck.
,	In addition, using the construction	

Textron uses to accuse Toro's products of infringement, U.S. Patent No. 3,236,034 discloses decks having a downwardly opening space, at least one cutting blade mounted on a spindle, and three rollers with one roller extending only partially across the width of the deck.

Category B art discloses decks having a downwardly opening space, at least one cutting blade mounted on a spindle, and three rollers with one roller extending only partially across the width of the deck. For those Category B references that do not have three rollers it would have been obvious to combine them with Category I art.

The Category I art teaches rotary decks having three rollers with one roller extending only partially across the width of the deck.

CLAIM 25

The lawn mower of claim 24 wherein said first roller and said second roller are positioned in along different axes of rotation.

Claim 25 is invalid under 35 U.S.C. §103 in view of various prior art references, alone or in combination.

As this limitation has been construed by Textron to accuse Toro's products of infringement, the Risboro brochure teaches front and rear deck assemblies having a second roller offset from the first roller.

As this limitation has been construed by Textron to accuse Toro's products of infringement, the Lesco 500 Rotary mower, the Deere 3235A with Nunes, and the Deere with Nunes 355, disclose a second roller in offset relation to the first roller.

In addition, Category C art teaches two offset rollers, U.S. Patent No. 3,654,749 and U.S. Patent No. 3,754,385 teach rotary cutting decks having multiple rollers positioned in an offset relation to other rollers.

As Textron construes this limitation to accuse Toro's products of infringement, Category B art discloses

	rotary decks with two rollers in offset positions to each other.	
	As this limitation is construed by Textron to accuse Toro's products of infringement, Category G art discloses decks in the claimed configuration.	Category D and I art disclose rotary decks having two rollers in offset positions to each other.
	In addition, using the construction Textron uses to accuse Toro's products of infringement, U.S. Patent No. 3,236,034 discloses a second roller in offset relation to the first.	
CLAIM 26		
The lawn mower of claim 25 wherein said third roller and said second roller	Claim 26 is invalid under 35 U.S.C. §103 in view of various prior art references, alone or in combination.	
rotate about the same axis of rotation.	As this limitation has been construed by Textron to accuse Toro's products of infringement, the Risboro brochure teaches front and rear deck assemblies having two rollers.	Category D and I art teaches using three rollers where two of the rollers are aligned in the access of rotation and a third roller is positioned offset from the first two.
	As this limitation has been construed by Textron to accuse Toro's products of infringement, the Lesco 500 Rotary mower, the Deere 3235A with Nunes, and the Deere with Nunes 355, disclose a third roller aligned with the axis of rotation of the second roller.	
	As Textron construes this limitation to accuse Toro's products of infringement, Category B art discloses rotary decks with a third roller aligned with the axis of rotation of the second roller.	
	As this limitation is construed by Textron to accuse Toro's products of	Category D and I art disclose rotary decks

	infringement, Category G art discloses decks in the claimed configuration.	having a third roller aligned with the axis of rotation of the second roller.
	In addition, using the construction Textron uses to accuse Toro's products of infringement, U.S. Patent No. 3,236,034 discloses a third roller aligned with the axis of rotation of the second roller.	
CLAIM 27		
The lawn mower of claim 26 wherein said second and third rollers are positioned	Claim 27 is invalid under 35 U.S.C. §103 in view of various prior art references, alone or in combination.	
forward of said first roller.	As this limitation has been construed by Textron to accuse Toro's products of infringement, the Risboro brochure teaches front and rear deck assemblies having two rollers.	U.S. Patent No. 3,754,385 of Category I teaches using three rollers where two of the rollers are aligned in the same axis of rotation and in front of the first roller.
	As this limitation has been construed by Textron to accuse Toro's products of infringement, the Lesco 500 Rotary mower, the Deere 3235A with Nunes, and the Deere with Nunes 355, disclose a third roller aligned with the axis of rotation of the second roller positioned in front of the first rear roller.	U.S. Patent No. 3,754,385 teaches rotary cutting decks having multiple rollers, two of which are aligned with the axis of rotation in front of the first roller.
	As Textron construes this limitation to accuse Toro's products of infringement, Category B art discloses rotary decks with a third roller aligned with the axis of rotation of the second roller, which are in front of the first rear roller.	
	As this limitation is construed by	U.S. Patent No.

Textron to accuse Toro's products of infringement, Category G art discloses decks in the claimed configuration.

3,754,385 of Category I teach using three rollers where two of the rollers are aligned in the same axis of rotation and in front of the first roller.

As this claim is construed by Textron to accuse Toro's products of infringement, U.S. Patent No.
3,236,034 discloses a third roller aligned with the axis of rotation of the second roller, which are in front of the first roller.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the following

documents:

- 1. Toro's Prior Art Statement; and
- 2. Certificate of Service

were served via Overnight Delivery, addressed as follows:

Christopher C. Campbell Hunton & Williams LLP 1900 K Street N.W. Washington, D.C. 20006

Dated: June 1, 2006